

VLADECK, RASKIN & CLARK, P.C.

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April 16, 2021

Hon. Loretta A. Preska
United States District Court Judge
United States District Court for the SDNY
500 Pearl Street
New York, NY 10007

Re: *United States v. Daniel Lynch*, 08 C5 1051 (LAP)

Dear Judge Preska:

I write to request an adjournment of the current briefing schedule in the above captioned matter for an additional three months. This is the fourth request for an adjournment and it is made with my client's and the Government's consent.

Since the Government's response to the pro se motion is currently due next week on April 22, 2021, I write in advance to request additional time to avoid burdening the Court and the Government with additional briefing. I request that the Government's time to respond be adjourned until late July 2021 so it may be responsive to additional defense briefing.

I was appointed as substitute counsel to assist Mr. Lynch concerning his pro se 18 U.S.C. § 2255 motion to vacate, set aside, or correct his sentence pursuant to the Criminal Justice Act. I am in contact with my client who is incarcerated in Allenwood Penitentiary by mail (he has no phone or email privileges) and I have recently gathered additional medical materials pertinent to the habeas petition. Due to the age of the case, the limited access to my client and the complexity of the issue I will require additional time to further investigate the merits of the claim and draft a brief.

Since the Government's response to the pro se motion is currently due next week on April 22, 2021, I write in advance to request additional time to avoid burdening the Court and the Government with additional briefing. I request that the Government's time to respond be adjourned until late July 2021 so it may be responsive to additional defense briefing.

Thank you for your time and consideration to this matter.

Respectfully submitted,

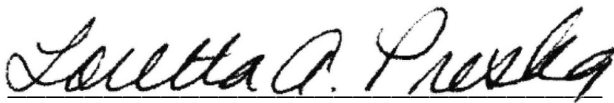
/s/ Susan J. Walsh
Susan J. Walsh

Cc: Kevin Mead, AUSA

The extension requested above is approved. The Government's deadline to respond is adjourned to July 23, 2021.

SO ORDERED.

Dated: April 20, 2021
New York, New York

A handwritten signature in black ink, reading "Loretta A. Preska". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

LORETTA A. PRESKA, U.S.D.J.